

UNITED STATES DISTRICT COURT  
DISTRICT OF RHODE ISLAND

UNITED STATES OF AMERICA

v.

CR. No.: 19-CR-00115-JJM-PAS

DOMINIQUE GOLDEN,  
a/k/a Raquel Golden,  
a/k/a Emily Greco,  
a/k/a Mellisa Moore,  
a/k/a Raquel Roberts,  
Defendant.

**REPLY IN RESPONSE TO DEFENDANT’S SENTENCING MEMORANDUM**

The Defendant has argued that “Ms. Golden was complaint with all conditions imposed by the Court” upon her release in this case, and that this alleged compliance “demonstrates Ms. Golden’s respect for the law . . . .” ECF 168, Defendant’s Sentencing Memorandum. The Government submits that the facts show that the Defendant was *not* compliant and that her post-release conduct shows a *lack of* respect for the law. The Government submits this Reply to ensure that the facts relating to the Defendant’s pretrial release and her subsequent detention are known to this Court and are included in the record.

On September 20, 2019, the Defendant appeared in the District of Rhode Island and was released on conditions of pre-trial release in this case. ECF 11, Order Setting Conditions of Release.

On March 10, 2020, the Defendant was arrested in the Southern District of Texas (SDTX) on the charges in the North District of Georgia (NDGA) in Case No. 20-CR-114-WMR-CCB. On March 23, 2020, following a detention hearing in the SDTX, the Court ordered her detained. *Exhibit 1*, Order of Detention, SDTX, Criminal Case No. H-20-479.

On March 30, 2020, in the NDGA, the Defendant moved to revoke the SDTX Order of Detention. *See* Docket, Case No. 20-CR-114-WMR-CCB, Motion for Review of Magistrate Judges Detention Order (ECF 203). In response, the Government filed an Opposition to Defendant's Motion for Revocation of Detention Order (NDGA ECF 226). *See Exhibit 2*, NDGA Case No. 20-CR-114-WMR-CCB, Government's Response in Opposition to Defendant's Motion for Revocation of Detention Order (with transcript of SDTX detention hearing).

On July 23, 2020, the Honorable William M. Ray, II denied the Defendant's Motion for Revocation finding "by clear and convincing evidence that the Defendant is a danger to the community, particularly in regard to their financial interests, and that no condition or set of conditions could ensure the safety of the community." *See Exhibit 3*, NDGA Case No. 20-CR-114-WMR-CCB, ECF 285, Order. In his Order, Judge Ray found that:

ZOOM, which was held on July 7, 2020. At said hearing, the Government proffered that on October 4, 2019, after the Rhode Island District Court had released Golden bond, Golden and Joshua Roberts, Defendant's husband and co-defendant, opened a joint bank account in person at the Woodforest National Bank located in Rhode Island. They used their real names but a fake social security number. The Government explained that whenever anyone opens a new bank account, the bank puts together a package with a signature card and driver's license number. The driver's license number in the bank's materials for the account matches Golden's Texas driver's license. Between October and February, when the account was closed, \$122,000 was moved through the account. The Government further proffered that when authorities arrested Golden in Houston, she claimed that she had worked a month at a hair salon and tanning salon that each paid her \$1,000. She also claimed that she ran a small teeth-whitening business where she had made \$500. Defendant did not have any other legitimate sources of income at that time.

*Exhibit 3*, NDGA Case No. 20-CR-114-WMR-CCB, ECF 285, Order, p. 8.

The Government submits that the Defendant's post-release conduct, specifically opening a bank account using a false social security number and using that account to move funds (\$122,000), an amount that was wholly inconsistent with the income that she disclosed to pretrial services does not show compliance with her conditions of release. Rather, this conduct shows that the Defendant could not be trusted to comply with the most basic condition of her release – that she not violate a federal, state or local law while on release.

Respectfully submitted,

ZACHARY A. CUNHA  
UNITED STATES ATTORNEY

A handwritten signature in blue ink that reads "Denise M. Barton". The signature is written in a cursive, flowing style.

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 25th day of January, 2023, I caused the within Government's Reply in Response to Defendant's Sentencing Memorandum to be filed electronically and to be available for downloading on the Court's ECF system:

A handwritten signature in blue ink that reads "Denise M. Barton". The signature is written in a cursive, flowing style.

DENISE M. BARTON  
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